

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA

vs.

No. 2:06-cr-00253

JUDGE FROST

KALI E. YOUNG

GOVERNMENT'S SENTENCING MEMORANDUM

The United States submits that the probation officer has correctly calculated the advisory guideline sentencing range in the defendant's case. The USPO has determined that the defendant's Total Offense Level is 17 and the defendant's Criminal History Category is VI. The Advisory Guideline range is 51-63 months.

There are no objections by the defense to the Presentence Investigation Report.

The United States would recommend a sentence within that advisory guideline range. In United States v. Williams, 436 F.3d 706, 708 (6th Cir. 2006)), the Sixth Circuit stated: "We now join several sister circuits in crediting sentences properly calculated under the Guidelines with a rebuttable presumption of reasonableness." Therefore, the United States submits that a sentence within the advisory guideline range would be reasonable under the rationale of United States v. Booker, 543 U.S. 220 (2005) and United States v. Williams.

Respectfully submitted,

GREGORY G. LOCKHART
United States Attorney

s/Timothy D. Prichard
TIMOTHY D. PRICHARD (0059455)
Assistant United States Attorney
Attorney for Plaintiff
303 Marconi Boulevard
Suite 200
Columbus, Ohio 43215
(614) 469-5715
Fax: (614) 469-5653
Tim.Prichard@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Sentencing Memorandum was served this 6th day of August, 2007, electronically on: David H. Thomas, Attorney for Defendant Kali Young.

s/Timothy D. Prichard
TIMOTHY D. PRICHARD (0059455)
Assistant United States Attorney